

LICOM

COMMUNICATIONS & ELECTRONICS, CO.

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November 19, 1996

Secretary, FCC
1919 M. Street, NW
Room 222
Washington, DC 20554

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FCC MAIL ROOM

RE: Advanced Television System MM Docket no. 87-268
and their impact upon the Sixth Further Notice 96-317
Existing Television Broadcast Service

Dear Chairman Hundt:

Licom Communications wishes to express its strong support for Federal Communication Commission action to reallocate the current UHF broadcast television channels 60 - 69, and make a portion of that spectrum available for public safety and commercial use. The first step in the process is reallocation of the UHF channels 60 - 69 as proposed by your staff in the above referenced digital television proceeding.

There is currently an urgent need in many parts of the country for additional public-safety and commercial radio channels. The Public Safety Wireless Advisory Committee (PSWACS), cosponsored by the FCC and NTIA, recently released its "Final Report" which found that public safety agencies alone need 2.5MHz of additional spectrum right now for interoperability, at least 25MHz within five years, and an additional 70MHz within the next fifteen years.

Licom Communications agrees with PSWAC finding. In our area of the country there are no additional radio channels available for the expansion of existing systems nor the for the implementation of new ones. The business community's need to provide services to its customers and staff are stifled by this lack of spectrum. Only immediate FCC action in making available new spectrum can help alleviate the problems faced by Licom Communications and many other business operations dependent upon two-way and other radio communications modes.

While we support the allocation of additional 800MHz spectrum for public-safety and business use, we also alert the Commission to problems with current DTV channel planning as it affects land mobile

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users of the 500MHZ shared TV channels 19 and 20 in the New Jersey and Eastern Pennsylvania area.

Licom Communications is currently licensed to operate radio communications systems on frequencies derived from sharing of the TV channels under 47 CFR, Part 90, Subpart L, Authorization in The Band 470 - 512MHZ(UHF-TV Sharing), of the FCC Rules. Our company operates 2 radio channels in this band to meet the needs of its customers. Approximately 15,000 persons in a 1,000 square mile area of New Jersey, & Pennsylvania are served by this system. This system is essential to their needs and to the operation of this company.

It would cost \$250,000 to replace this system. The Commission's proposal to allow TV Broadcast stations to operate on adjacent TV channels 18 and 21 frequencies in Secaucus and Vineland, New Jersey would create harmful interference to our communications system, thus jeopardizing our ability to deliver the type and quality of services demanded of us.

We call to the attention of the Commission that the docket identifies separation of the proposed TV station from the center of the urbanized area, in this instance Philadelphia, PA., as less than the technically appropriate 110 miles between the broadcast operation site and the nearest adjacent channel land mobile site. In fact, channel 18 in Secaucus, New Jersey will be less than 80 miles from center city Philadelphia. Channel 21 in Vineland, New Jersey would be located only a little over 32 miles from center city. However, we respectfully remind you that the allocation for use of the communications channels derived from TV channels 19 and 20 extends outward in a 50 mile radius of the center of the urbanized area. Further, the Commission has granted waivers of this "50 mile rule" in support of various operations, further expanding the radius to as much as 60 miles. Thus the distance from the currently licensed operations and the proposed adjacent DTV channel is not be desired 110 miles, but considerably less as evidenced below.

Our radio system, which operates on channels in the TV Channel 19 spectrum, will be impacted by interference from the proposed implementation of the TV Channel 18 in Secaucus, New Jersey. The geographical coordinates of this proposed DTV transmitter is [40-42-43N, 74-00-49W]. Our currently licensed transmitter site is located at the geographical coordinates 40-09-29N, 74-54-39W. This is a separation of only 61 miles to the proposed DTV transmitter site! It is our position that such close spacing of interfering will Jeopardize the operation of our system and the delivery of our essential services.

We also urge the Commission not to eliminate the use of Channel 20 for land mobile service in the Philadelphia region. Many business and public-safety agencies have implemented operations on these channels at a great expenditure of company or public funds.

We respectfully ask you to consider the impact of this proceeding on the business and public-safety entities operating on TV Channels 19 and 20. With no other channel availability, where in the radio spectrum would they move? Who would pay for this? Is it fair and appropriate to expect the local tax base to absorb such a mandate? Is this compliant with Congressional mandates?

Licom Communications urges the Commission to act expeditiously and favorably in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Liuzzi", with a long horizontal flourish extending to the right.

Richard Liuzzi